



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue
Seattle, Washington 98101

PRCCF 1.4

FEB 09 1993

Reply To
Attn Of: HW-104

Lynn Guilford
Science Applications International Corp
18702 North Creek Parkway, Suite 211
Bothell, WA 98011

Re: RCRA comments on PCC RPA

Dear Ms. Guilford:

As agreed in our phone conversation today, I am sending you my comments on the RPA to avoid further delays, since the time before the contract expires is limited.

The comments are in the form of an attached list of general comments and a marked up copy of the draft RPA. One major area that you need to focus on in your revision is providing and evaluating evidence for past or present releases.

If you have questions about these comments, please call me.

Sincerely,

Sylvia E. Burges
RCRA Compliance Section

Enclosures

cc (w/o encl): ✓ D. Robinson
M. Slater

USEPA SF



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COMMENTS
PRECISION CASTPARTS CORPORATION
RCRA PRELIMINARY ASSESSMENT

1. "Sludge" should be used to describe only those wastes that result from wastewater treatment; other wastes should be identified as sediments, solids, precipitates, etc. since they are not sludges as defined by RCRA regulations.
2. In Section 2.3 you should not necessarily accept PCC's definition of which wastes are hazardous, since EPA believes that PCC has failed to perform adequate waste characterization and is not treating some hazardous wastes appropriately. In general your evaluation of wastestreams should be based on what PCC is actually doing, not what they say, although that should also be indicated in the RFA. Similarly, none of the areas claimed by PCC as "satellite accumulation areas" is in fact operated in a manner meeting the applicable regulations; therefore, such areas should be identified neutrally, eg. as "waste accumulation areas".
3. The location of the wells cited in section 3.6 should be shown on Figs. 2-4, as applicable. It is not clear from this discussion whether it is possible or likely that PCC operations could be the cause of the contamination detected in the sampling. A clearer discussion of this issue should be provided, including among other issues, location, methods, and duration of past as well as present handling of chemicals used at PCC when these contain the constituents observed in sampling; if possible, estimates of quantities handled should also be provided. In addition, an assessment must be made as to whether this evidence can be interpreted as evidence that a release may have occurred at the facility.

The potential evidence for releases based on surface water sampling (including storm water) must also be clearly presented and analyzed. Discussion of sampling results in Johnson Creek showing higher levels upstream of the outfall should include consideration of outfalls or other possible discharges by PCC upstream of the outfall under consideration in the sampling study.

4. When discussing release controls and potential at SWMUs that handle solvents and other materials to which untreated pavement (concrete or asphalt) is pervious, more needs to be stated regarding the condition of the concrete or asphalt -- eg. uncoated, cracked or not, presence or absence of stains or other evidence of releases (such as appearance of dribbles down sides of storage containers); affected SWMUs include 1, 2, 4, 5, 6, 16, 17, 18, 19, 50, 52-58. Where such evidence of possible past releases is present, recommendations should include, as a minimum, engineering assessment of the integrity of the concrete, followed by evaluation of potential soil or groundwater

contamination if indicated. In addition, the potential for release in such cases should be reevaluated.

Similarly, where waste is treated or stored in tanks, the discussion should include a discussion of tank integrity and implications for release and need for engineering evaluation or other studies, as appropriate.

5. Photo references must be checked carefully for accuracy; for instance, on p. 43 you reference photo 94 as showing holding tanks, although only a filter press is actually shown in photo 94. The photos must also have the correct facility number on them. The photo log needs to be supplemented with a facility map marked with arrows and numbers indicating the location and direction of each of the photos.

6. Regarding SWMU 43, the evaluation of the waste stream has been completed and DEQ advised; the issue should be addressed in the RPA only by identifying the waste managed as a F006 sludge, without reference to special studies. The same approach should be used wherever this waste stream is discussed in this RPA.

7. The function of SWMUs 44 and 45 needs to be clarified -- when does the F006 waste go to one v. the other and why?

8. The discussion of release history of SWMU 62 is unclear -- in many instances a reader cannot determine what happened or even whether the material released was a waste or product. In addition, many of the releases suggest outfall locations in addition to Johnson Creek. The RPA needs to clearly describe this unit and identify significant modifications to the extent that they affect release history.

9. Discussion of release history (and consequently also the conclusions) for many of the SWMU's does not adequately reflect either findings of recent inspections or past reports of releases documented in DEQ files; for instance, there have been many complaints over the years of releases in PCC buildings and parking lots, and evidence of releases was documented in several locations (SWMU 45, 55, 56 53, 52, and in the TBO) during the 2/92 CEI. During the VSI, in the vicinity of SWMU 52, evidence that leaking drums of alcohol-based spent slurry had been stored on dirt was observed; that evidence should be included in the RPA.